

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

AMERICAN AIRLINES, INC., §
§
Plaintiff, §
§
v. § Civil Action No. 4:23-CV-00775-Y
§
KIWI.COM, INC. and KIWI.COM, S.R.O., §
§
Defendants. §

**DEFENDANT KIWI.COM, INC.’S UNOPPOSED MOTION
FOR EXTENSION OF RESPONSIVE PLEADING DEADLINE**

Defendant Kiwi.com, Inc. files this unopposed motion and respectfully requests that its deadline to respond to Plaintiff American Airlines, Inc.’s (“American”) Complaint be extended by thirty (30) days to September 22, 2023. In support of this motion, Kiwi.com, Inc. states as follows:

1. On August 2, 2023, American served its Complaint on Kiwi.com, Inc. (Doc. 1.)
2. Kiwi.com, Inc.’s responsive pleading is currently due on August 23, 2023.
3. Kiwi.com, Inc. respectfully requests that this deadline be extended by thirty (30) days and that Kiwi.com, Inc. be given until September 22, 2023 to answer, move, or otherwise respond to the Complaint.
4. Kiwi.com, Inc.’s counsel met and conferred with American’s counsel concerning this extension, and American’s counsel stated that they do not oppose this extension.
5. Kiwi.com, Inc. asserts that good cause exists for this extension of time, the parties will not be prejudiced by this extension, and the extension is not sought for purposes of delay.

For the foregoing reasons, Kiwi.com, Inc. respectfully requests that the Court extend Kiwi.com, Inc.'s time to respond to American's Complaint by thirty (30) days, from August 23, 2023 to September 22, 2023.

Date: August 18, 2023

Respectfully submitted,

By: /s/ Spencer D. Hamilton
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Attorneys for Defendant Kiwi.com, Inc.

CERTIFICATE OF CONFERENCE

I hereby certify that on August 17-18, 2023, counsel for Kiwi.com, Inc. met and conferred with counsel for American concerning the relief requested in this motion. Counsel for American stated that they do not oppose this extension of time.

/s/ Spencer D. Hamilton
Spencer D. Hamilton

CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2023, I caused the foregoing to be electronically filed with the Clerk of this Court using the CM/ECF system, which will send notice of said filing to counsel of record.

/s/ Spencer D. Hamilton
Spencer D. Hamilton